



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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Ser EP1442/ 01259

JUL 05 2000

From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command
(Channing Blackwell), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: HEALTH AND SAFETY PLAN REVIEW OF LTTD (LOW TEMPERATURE
THERMAL DESORPTION) SOIL REMEDIATION, SITE 89, MARINE CORPS BASE
CAMP LEJEUNE, CAMP LEJEUNE, NC

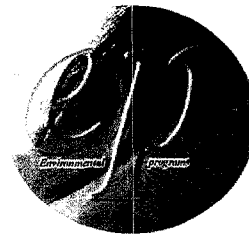
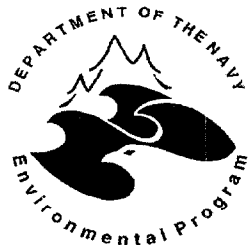
Ref: (a) LANTNAVFACENGCOM request of 15 Jun 00

Encl: (1) Subject Site Health and Safety Plan
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document and are forwarding our comments to you as enclosure (1).
2. Please complete and return enclosure (2) as your comments are needed to continually improve our services to you.
3. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Ms. Mary Ann Simmons at (757) 363-5556. The DSN prefix is 253. The e-mail address is: simmonsm@nehc.med.navy.mil.

P.B. Gillooly
P. B. GILLOOLY
By direction

Copy to: (w/o Encl (2))
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NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

Health and Safety Plan Review

Location: Camp Lejeune, North Carolina

Command: Marine Corp Base Camp Lejeune

Site: Site 89

Work Description: LTDD [Low Temperature Thermal Desorption] Soil Remediation

Document Date: May 2000

Contract No/Delivery Order No: N62470-97-D-5000/0050

EP Document No: 1442

Prepared for: LANTNAVFACENGCOM

Prepared by: OHM Remediation Services Corporation

Date Received: 20 May 2000

Reviewed by: Ms. Mary Ann Simmons, (757) 462-5556, DSN 253,
simmonsm@nehc.med.navy.mil

HEALTH AND SAFETY PLAN REVIEW

Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comment: We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references.

Specific Comments:

1. A map to the emergency medical facility needs to be included.
2. Table 9.1 in the base-wide health and safety plan is a list of emergency points of contact. There are both on-base and off-base telephone numbers. The preferred initial point of contact is not obvious. The base on-scene coordinator should also be included. This is usually, but not always, the fire chief.
3. Emergency decontamination procedures need to be included.
4. A heat stress prevention plan needs to be included. This is especially important given the time of year, location and level of PPE.
5. Since this is such a high profile job, visitors are likely. Some of them will have the proper training, PPE and medical clearances; some will not. We recommend developing a visitor SOP (or something similar). It might be a good idea to have extra binoculars available.
6. Section 4.1 and Section 6.0 of the Addendum both refer to procedures or products that will be developed during site mobilization and posted. Since mobilization either has occurred or is occurring, this information should have been included.
7. A specific respirator, Survivair 2020, is listed as part of the Level C gear. Generally one type of respirator will not fit everyone. We recommend changing this entry to "full facepiece air purifying respirator."
8. Activity Hazard Analyses (AHAs): Given the location, we recommend including the potential hazard of contact with insects, especially ticks, in all of the AHAs. Lyme disease may be a potential hazard.

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
ANSI:	American National Standards Institute
ATSDR:	Agency for Toxic Substances and Disease Registry
BBP:	Bloodborne Pathogen Program
COC:	Contaminant of Concern
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HBV:	Hepatitis B Virus
HIV:	Human Immunodeficiency Virus
IDLH:	Immediately Dangerous to Life and Health
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NIOSH:	National Institute for Occupational Safety and Health
NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value